

# EXHIBIT

1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ARIADNA JACOB and INFLUENCES, INC.

Plaintiffs,

-against-

TAYLOR LORENZ, and THE NEW YORK TIMES  
COMPANY,

Defendants.

No.: 1:21-cv-06807-ER

**DECLARATION OF ARIADNA JACOB IN SUPPORT OF MEMORANDUM  
OF LAW IN OPPOSITION TO MOTION BY DEFENDANTS  
THE NEW YORK TIMES COMPANY AND TAYLOR LORENZ  
TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT  
AND MEMORANDUM OF LAW IN SUPPORT**

I, ARIADNA JACOB, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Plaintiff in the above-referenced cause individually and I am the founder and CEO of Plaintiff Influences, Inc

2. I have reviewed Exhibits 3 (Doc. 18-3) and 4 (Doc. 18-4). These documents do not represent the entirety of the exchange of documents and information between Plaintiffs and Defendants *The Times* and Taylor Lorenz ("***Defendants***"). There are many other documents and information that were provided to Defendants in the days, weeks, and even months preceding the publication of the article published by Defendants on August 14, 2020 (the "***Article***", Doc. 18-1).

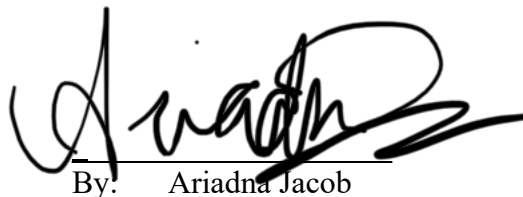
3. I submit this declaration to annex additional documents relevant to the Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint in this action. Annexed hereto as Exhibit A is a true and correct copy of additional

prepublication responses submitted to Defendants by Plaintiffs on August 12, 2020 in response to questions that Defendants posed to Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Las Vegas, Nevada

January 24, 2022

  
By. Ariadna Jacob